

Appl. No: 09/943,242  
Amdt. Dated: March 22, 2005  
Reply to Office action of December 22, 2004

### **REMARKS/ARGUMENTS**

Claims 1-27 remain in the application. Claims 23-27 which were previously withdrawn are now cancelled by this response. Claims 28-30 were previously cancelled. Claim 31 is cancelled by this amendment.

#### **A. Rejections under 35 U.S.C. 112.**

Cancellation of claim 31 renders the rejection moot.

#### **B. Rejections under 35 U.S.C. 102.**

Claims 1, 5-11 and 28-31 were rejected under 35 U.S.C. 102(b) based upon Tanenbaum. This rejection is respectfully traversed.

Claim 1, as amended, calls for a controller having a memory interface coupled directly to the data memory and a mass storage interface coupled directly to the mass storage device's interface. This amendment clarifies the nature of the connection in a manner that better distinguishes over the indirect coupling illustrated by the disk in Tanenbaum that is coupled through a disk controller and then through a system bus to a memory and separately to a processor. At least these features of claim 1 is not shown or suggested by Tanenbaum.

Claims 5-11 that depend from claim 1 are believed to be allowable for at least the same reasons as claim 1.

Claims 1-4 and 21 were rejected under 35 U.S.C. 102(e) based upon Hunsaker. This rejection is respectfully traversed. The amendments to claim 1 clarify the nature of the connection in a manner that better distinguishes over the indirect coupling illustrated by the disk in Hunsaker. At least these features of claim 1 is not shown or suggested by Hunsaker.

Claims 3-4 and 21, which depend from claim 1, are allowable for at least the same reasons as claim 1.

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Claims 1, 12, 13 and 20 were rejected under 35 U.S.C. 102(e) based upon Zaidi et al. This rejection is respectfully traversed. Claim 1, as amended, clarifies the nature of the connection in a manner that better distinguishes over the indirect coupling illustrated by the disk in Zaidi. At least these features of claim 1 is not shown or suggested by Tanenbaum.

Claims 12, 13 and 20, which depend from claim 1, are allowable over Zaidi et al. for at least the same reasons as claim 1.

Claims 1, 14, and 20 were rejected under 35 U.S.C. 102(e) based upon Moriarty et al. and claims 1 and 19 were rejected under 35 U.S.C. 102(e) based upon Ellison et al. These rejections are respectfully traversed. The amendments to claim 1 are believed to clarify the nature of the direct coupling and to better distinguish over the Moriarty and Ellison references.

Claims 1, 13-16 and 20-22 that depend from claim 1 are distinct over Yiu et al. at least because the Yiu reference does not show or fairly suggest the direct coupling called for in claim 1 as amended.

Claims 17 and 18 depend from claim 1, are distinct over Houston et al. at least because Houston et al do not show or fairly suggest the direct coupling called for in claim 1 as amended.

**C. Conclusion.**

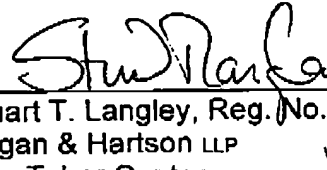
In view of all of the above, claims 1-22 are believed to be allowable and the case in condition for allowance which action is respectfully requested. Should the Examiner be of the opinion that a telephone conference would expedite the prosecution of this case, the Examiner is requested to contact Applicants' attorney at the telephone number listed below.

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Any fee deficiency associated with this submittal may be charged to Deposit  
Account No. 50-1123.

Respectfully submitted,

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Stuart T. Langley, Reg. No. 33,940  
Hogan & Hartson LLP  
One Tabor Center  
1200 17th Street, Suite 1500  
Denver, Colorado 80202  
(720) 406-5335 Tel  
(303) 899-7333 Fax